

UNITED STATES DISTRICT COURT
IN THE WESTERN DISTRICT OF MICHIGAN
Southern Division

RICARDO MARTINEZ, et al.

Case No. 1:16-cv-681

Plaintiffs

Hon. Robert J. Jonker

v.

BLUE STAR FARMS, INC., et al.

Defendants.

Teresa Hendricks (P46500)
Mariza Gamez-Garcia (P64271)
Benjamin O'Hearn (P79252)
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PLAINTIFFS' MOTION TO COMPEL DISCOVERY AND FOR OTHER RELIEF

Plaintiff, through their attorneys Migrant Legal Aid and Willenson Law, LLC, move this Court for an order compelling discovery from Defendants and for other relief. For the reasons set forth in the accompanying brief, Plaintiffs request that this Court enter an order:

- a) Compelling Defendants to provide complete records in response to requests for production 6 and 24, including hard copy personnel files for Plaintiffs and putative Class members and Microsoft Excel spreadsheets with time and pay information;
- b) Granting reasonable attorney fees associated with pursuing this motion; and
- c) Any and all other relief this Court deems appropriate.

Date: July 10, 2017

/s/ Benjamin O'Hearn
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Benjamin O'Hearn (P79252)
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